



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary
William R. Selbig, Regional Director

Northeast Region Headquarters
Green Bay Service Center
1125 N. Military Ave., P.O. Box 10448
Green Bay, Wisconsin 54307-0448
Telephone 920-492-5800
FAX 920-492-5913
T.D. 920-492-5912

September 24, 1999

IN REPLY REFER TO:

FAXED to 920/682-7972

Mr. Donald Brisch
Rockwell Lime Company
4110 Rockwood Road
Manitowoc, WI 54220

FID # 436034390

SUBJECT: Stack Test Request For Pressure Hydrator

Dear Mr. Brisch:

You requested today that I explain why the stack test performed April 15, 1999 by EMT, Inc. on the pressure hydrator, process P38, is not a valid stack test. Testing was done to measure particulate matter emissions, using Methods 5 and 202. I trust the following explanation is satisfactory.

1. The isokinetics of test run #1 were 115.9%. The method requires isokinetics per run between 90 and 110%. Therefore the run is invalid.
2. The sample volumes collected in runs #2 and #3, were 23.156 dscf and 21.802 dscf, respectively. The method requires a minimum sample volume of 30 dscf. Therefore these runs are invalid.

The above deviations from Method 5 void all three runs. Thus the test is considered invalid and unacceptable to characterize the rate of particulate matter emissions.

My recent inspection report requests a stack test plan, with schedule, to retest P38. This plan should be submitted by September 30, 1999, with testing proposed as soon as possible. The test results are needed to support the upcoming permit application on modifications to P38 and demonstrate compliance with the particulate emission limit of 0.4 lb/1000 lb gas. As such, I would like to witness the testing. If you have any questions please call me at 920/492-5794.

Sincerely,

James G. Crawford, P.E.
Environmental Engineer
Air Management

cc: ENF - AM/7



Quality Natural Resources Management
Through Excellent Customer Service

